



U.S. Captioning Company

One of the country's leading providers of services for the Deaf and Hard of Hearing including :

♦ Real-Time Closed Captioning ♦ Post Production Captions ♦ Spanish Captioning ♦ C.A.R.T. Services ♦ Video Description

Before the Federal Communications Commission
Washington, D.C. 20554

In the Matter of:)
Closed Captioning of Internet)
Protocol-Delivered Programming:)
Implementation of the Twenty-)
First Century Communications)
and Video Accessibility Act of)
2010

MB Docket No. 11-154
CG Docket No. 05-231

Comments on Application of the IP Closed Captioning Rules to Video Clips and Reply to Comments

U.S. Captioning Company, a closed captioning service provider, is replying to the request made Federal Communications Commission Media Bureau for comments and replies on comments. U.S. Captioning Company is committed to providing the highest quality closed captioning and video description services. We recognize the value of accurate closed captioning, and understand the challenges today's media landscape offers. In order to better serve our clients and the Deaf and Hard of Hearing Community, we request the Commission clarify a matter central to this process: the definition of a "video clip." Also, we feel it is important that the Commission hear from a closed captioning service vendor on some of the questions asked by the Commission.

- What is the quality of the captioning on IP-delivered video clips?

This brings up the wording of "Send program files to video programming distributors and providers with captions as required by this section, with at least the same quality as the television captions provided for the same programming."¹ While we understand the challenges of displaying captions in the variety of environments out there, by having a standard that applies to real-time television captions that is measurable and attainable, you provide a baseline minimum for everyone. There will always be factors outside the control of parties providing any video content, just as there are in any industry. We can no more control the weather than we can control dropped packets of information through the Internet. A standard of 95% accuracy, which Canada currently uses for English Language programming,² is attainable in real-time television closed captioning. On February 20th, the Commission added new rules for television programming with captions. The new rules are not in effect nor announced, but they will distinguish between pre-recorded, live and near-live programming. The new rules should also apply to video clips to provide unified, comprehensive accuracy standards that are measurable and realistic.

¹ 47 C.F.R. §§ 79.4(c)(1)(i)

² Appendix to Broadcasting Regulatory Policy 2012-362 §2, effective Sept. 1 2012,
<http://www.crtc.gc.ca/eng/archive/2012/2012-362.htm>

- What are the potential costs and benefits of requiring captioning of IP-delivered video clips?

There are a variety of solutions available for all content providers. Each Video Programming Distributor (“VPD”) has unique needs and challenges, making the cost of services different for each one. As with any service or product in any industry, prices change as the service/product becomes more commonplace. The cost of providing real-time closed captioning services today is not the same as it was in 1995, for example. The need for real-time closed captioning services gave rise to an industry, with service and technological innovations, which continues to this day. The main factor for this growth can be attributed to a requirement made by the Commission. IP-delivered video clips benefit not only the Deaf/Hard of Hearing population, but many hearing users choose to enable closed captioning in a variety of environments.

- To the extent that some entities have already captioned these clips, what technical challenges, if any, had to be addressed?

The main technical challenge of displaying closed captioning on IP-delivered video content stems from the lack of a universal standard. This issue is starting to get better, with the adoption of Society of Motion Picture and Television Engineers Timed Text format and other standards by major media players. There are many timed text file types, and captioning data found in an Over the Air (“OTA”) broadcast is vastly different than data that is IP-delivered. The best way for these challenges to be resolved is for the hard work of all the industry professionals to be recognized and continued. The options available now as compared to 3 years ago are vast. These challenges have been on the minds of many of our clients and partners, not only to their benefit, but to the benefit of all consumers.

- How does the captioning of IP-delivered video clips differ from the captioning of full-length IP-delivered video programming? Similarly, what are the differences between captioning live or near-live IP-delivered video clips, such as news clips, and prerecorded IP-delivered video clips?

The delivery of IP-delivered video content is handled in many ways. Long form or short form, if the content is created to be shown at a late enough date -for example, a movie- captions are created as part of the production process. Currently, if a clip is taken from a captioned video, those captions will not stay embedded due to their very nature as timed text relating to the original video content. Any clip taken from full length content will need its own captioning file. The same is true for live and near-live content regardless of its length: removing a clip of content from already captioned content does not transfer the original captioning as that captioning is timed to the parent file. There are hardware and software solutions available to make the process easier, or even deliver near-live content with captions based on a file generation process tied to the real-time process. The real enemy of this process is time. There are no differences in the mechanics of the process. Even though the clip of content may be generated from pre-existing content that may have captions, it becomes a new file, with a need for its own caption file.

In conclusion, the goal of providing closed captioning to video content, regardless of length or medium of delivery to the viewer, is one that benefits us all. The questions asked by the Commission pertain to a broad spectrum of issues, and clarification/exposition on the definition of “video clip” would be advantageous to all concerned parties.

With respect, submitted by:

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